

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

DAVID MAZZA,

Plaintiff,

v.

VERIZON SICKNESS AND ACCIDENT DISABILITY  
BENEFIT PLAN FOR NEW ENGLAND ASSOCIATES,  
VERIZON COMMUNICATIONS INC., AETNA  
CASUALTY AND LIFE INSURANCE COMPANY,

Defendants.

Civil Act. No. 04-30020-MAP

ASSENTED TO MOTION TO EXTEND THE TIME TO ANSWER, MOVE OR OTHERWISE  
RESPOND TO PLAINTIFF'S COMPLAINT

Defendants, Verizon New England Inc., Verizon Communications Inc., and Aetna Casualty and Life Insurance Company, hereby move this Court to extend the time for them to respond to plaintiff's Complaint. As grounds, defendants state the following:

1. The Complaint in this matter was served on or around February 20, 2004 on defendant Verizon Communications Inc. Accordingly, this defendant's answer or initial response is currently due on March 11, 2004.

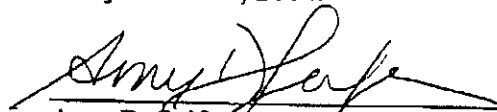
2. Defendant Verizon Communications Inc. requires an initial extension of 30 days for the purpose of continuing its factual investigation into the allegations of the Complaint and to determine an appropriate response, or until April 10, 2004. Defendants Verizon New England Inc. and Aetna Casualty and Life Insurance Company, while willing to waive service, desire to answer on the same date as defendant Verizon Communications Inc., and therefore also

answer on the same date as defendant Verizon Communications Inc., and therefore also request that the date on which their initial response or answer to the Complaint is due be set at April 10, 2004. This is defendants' first request for such an extension.

3. Counsel for defendants contacted counsel for plaintiff, Anthony G. Collins, by telephone on March 3, 2004. Mr. Collins stated that plaintiff assented to this motion.

Based upon the foregoing, defendants requests, and plaintiff assents, to an extension of 30 days to answer, move or otherwise respond to the Complaint until April 10, 2004.

Respectfully submitted this 9th day of March, 2004.



Amy D. Seifer, BBO 550639  
Lisa M. Birkdale, BBO 549663  
Verizon Communications Inc.  
Legal Department  
185 Franklin Street  
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(617) 743-5764

Attorney for Defendants  
Verizon New England Inc.  
Verizon Communications Inc.

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1625 Eye Street, NW  
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(202) 383-5300

Attorneys for Defendants

Assented to by:

request that the date on which their initial response or answer to the Complaint is due be set at April 10, 2004. This is defendants' first request for such an extension.

3. Counsel for defendants contacted counsel for plaintiff, Anthony G. Collins, by telephone on March 3, 2004. Mr. Collins stated that plaintiff assented to this motion.

Based upon the foregoing, defendants requests, and plaintiff assents, to an extension of 30 days to answer, move or otherwise respond to the Complaint until April 10, 2004.

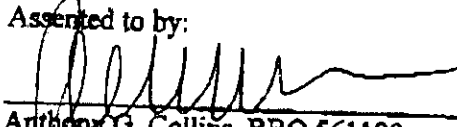
Respectfully submitted this 9th day of March, 2004.

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Attorney for Defendants  
Verizon New England Inc.  
Verizon Communications Inc.  
Aetna Casualty and Life Insurance Company

Assented to by:



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Anthony G. Collins, BBO 561180  
121 State Street, Suite 102  
Springfield, MA 01103  
(413) 746-9003


Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Assented To Motion To Extend The Time To Answer, Move or Otherwise Respond to Plaintiff's Complaint has been served on March 9, 2004 by first class U.S. mail, postage pre-paid, upon the following counsel of record:

Anthony G. Collins  
121 State Street, Suite 102  
Springfield, MA 01103  
(413) 746-9003

Attorney for Plaintiff



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